

Mr. Troy T. Wilkinson  
Howmet Corporation, LaPorte Casting  
1110 E. Lincolnway  
LaPorte, IN 46350

Re: 091-13562-00047  
First Minor Permit Revision to  
MSOP 113-9079-00024

Dear Mr. Wilkinson:

Howmet Corporation, LaPorte Casting was issued a permit on July 20, 2000 for a stationary metal alloy casting plant. A letter requesting a correction in parametric monitoring recording requirements was received on December 6, 2000. A letter notifying the Office of Air Management of the addition of a monoshell surface coating booth was received on January 11, 2001. Testing Requirements for PM and PM10 have also been added to the permit. A letter notifying the Office of Air Management of a change in ownership and the addition of persons as authorized individuals was received on January 26, 2001. A letter notifying the Office of Air Management of an error in the MSOP was received on February 10, 2001, requesting the addition of Section C "Pressure Gauge Specifications". Pursuant to the provisions of 326 IAC 2-6.1-6(g)(3) a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document. All other conditions of the permit shall remain unchanged and in effect.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Phillip Ritz, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for extension (3-6878), or dial (973) 575-2555, extension 3241.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
PR/EVP

cc: File - LaPorte County  
U.S. EPA, Region V  
LaPorte County Health Department  
Air Compliance Section Inspector Rick Massooels  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michelle Boner

# **MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY**

**Howmet Corporation, LaPorte Casting  
1110 E. Lincolnway  
LaPorte, IN 46350**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP091-11567-00047	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 20, 2000
Minor Permit Revision: 091-13562-00047	Pages Affected: 4, 8 through 15, 17, 18 and 19

Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:
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## TABLE OF CONTENTS

<b>A</b>	<b>SOURCE SUMMARY</b> . . . . .	<b>4</b>
A.1	General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]	
A.2	Emission Units and Pollution Control Equipment Summary	
A.3	Part 70 Permit Applicability [326 IAC 2-7-2]	
<b>B</b>	<b>GENERAL CONSTRUCTION CONDITIONS</b> . . . . .	<b>6</b>
B.1	Permit No Defense [IC 13]	
B.2	Definitions	
B.3	Effective Date of the Permit [IC13-15-5-3]	
B.4	Revocation of Permits [326 IAC 2-1.1-9(5)]	
B.5	Modification to Permit [326 IAC 2]	
B.6	Minor Source Operating Permit [326 IAC 2-6.1]	
<b>C</b>	<b>SOURCE OPERATION CONDITIONS</b> . . . . .	<b>8</b>
C.1	Particulate Matter Emission Limitations For Processes with Process Weight Rates Less	
C.2	PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]	
C.3	Preventive Maintenance Plan [326 IAC 1-6-3]	
C.4	Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]	
C.5	Inspection and Entry [326 IAC 2-7-6(2)]	
C.6	Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]	
C.7	Permit Revocation [326 IAC 2-1-9]	
C.8	Opacity [326 IAC 5-1]	
C.9	Fugitive Dust Emissions [326 IAC 6-4]	
	<b>Testing Requirements</b>	
C.10	Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]	
	<b>Compliance Monitoring Requirements</b>	
C.11	Compliance Monitoring [326 IAC 2-1.1-11]	
C.12	Monitoring Methods [326 IAC 3]	
C.13	Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]	
C.14	Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]	
	<b>Record Keeping and Reporting Requirements</b>	
C.15	Malfunctions Report [326 IAC 1-6-2]	
C.16	Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]	
C.17	General Record Keeping Requirements [326 IAC 2-6.1-2]	
C.18	General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]	
C.19	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
<b>D.1</b>	<b>EMISSIONS UNIT OPERATION CONDITIONS - Shotblasters</b> . . . . .	<b>16</b>
	<b>Emission Limitations and Standards</b>	
D.1.1	Particulate Matter (PM) [326 IAC 6-3-2(c)]	
	<b>Compliance Determination Requirements</b>	
D.1.2	Testing Requirements [326 IAC 2-1.1-11]	
D.1.3	Particulate Matter (PM)	
	<b>Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]</b>	
D.1.4	Visible Emissions Notations	
D.1.5	Parametric Monitoring	

- D.1.6 Baghouse Inspections
- D.1.7 Broken or Failed Bag Detection

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**  
D.1.8 Record Keeping Requirements

**D.2 EMISSIONS UNIT OPERATION CONDITIONS - Shell Preheater Ovens, Boilers . . . . . 20**

**Emission Limitations and Standards**

- D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]
- D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.2.3 Natural Gas Fuel

**Compliance Determination Requirements**

- D.2.4 Testing Requirements [326 IAC 2-1.1-11]

**Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

<b>Annual Notification . . . . .</b>	<b>22</b>
<b>Malfunction Report . . . . .</b>	<b>23</b>

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary metal alloy casting plant.

Authorized Individual: Troy T. Wilkinson, Jody Warner and Connie Lawe  
Source Address: 1110 E. Lincolnway, LaPorte, IN 46350  
Mailing Address: 1110 E. Lincolnway, LaPorte, IN 46350  
Phone Number: 219-326-7400  
SIC Code: 3324  
County Location: LaPorte  
County Status: Attainment for all criteria pollutants  
Attainment area for all other criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD Rules

### A.2 Emissions units and Pollution Control Equipment Summary

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This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) Ceramic Mold Operation, with a maximum capacity of 0.66 tons of metal and ceramic molds per hour and consisting of the following:
  - (1) One dewax furnace, with a maximum rated heat capacity of 1.9 mmBtu per hour, identified as DEWAX-BIG-BERTHA, utilizing a natural gas fired afterburner as control;
  - (2) Sanding towers, identified as STUCCO-TWR-7 thru STUCCO-TWR-22 & STUCCO-TWR-24 thru STUCCO-TWR-30, with a maximum capacity of 0.66 tons per hour of sand, utilizing a baghouse/settling chamber as particulate control, and exhausting to stacks ZD1, ZD2, and ZD3.
- (b) Finished casting line, with a maximum capacity of 3.0 tons per hour of unfinished castings and ceramic shells and consisting of:
  - (1) Arc welding gate removal, identified as PLASMA-CUTTER;
  - (2) Fifty-two (52) grinding booths, identified as DUST-COLL-FARR-001 thru DUST-COLL-FARR-004 & DUST-COLL-FARR-006 thru DUST-COLL-FARR-053, with a maximum capacity of 3.0 tons per hour of metal, each using a single cartridge-filter system as control, and exhausting to the interior of the building;
  - (3) One (1) Shotblast cabinet, identified as BLAST-05, with a maximum capacity of 3.0 tons per hour of metal, using a baghouse/settling chamber as control, and exhausting to stacks ZD1, ZD2, and ZD3;
  - (4) One (1) Power wash shell removal heater, identified as Z-WASH-003, with a maximum capacity of 1.35 mmBtu per hour;
  - (5) One (1) Chemical Shell removal heater, identified as LOW-TEMP, with a maximum capacity of 2.70 mmBtu per hour;
  - (6) Pneumatic Shell Removal, identified as KNOCKOUT-01 and KNOCKOUT-02, each with a maximum capacity of 0.33 tons per hour of casting shells, using a baghouse as control, and exhausting to stacks ZK1 and ZK2.

- (c) One Metal Melting and Auxiliary Operations, with a maximum capacity of 3.0 tons per hour of metal and consisting of:
  - (1) Nine (9) Shell Preheater Ovens, identified as VACUUM-CAST-02, ROLLOVER-CAST-05, VACUUM-CAST-06, VACUUM-CAST-08, VACUUM-CAST-09, & VACUUM-CAST-10, with a maximum rated heat input of 6.8, 0.75, 6.8, 6.8, 6.8, 0.75, 6.8, 6.8 and 0.75 million British Thermal Units (mmBtu) per hour, respectively, and exhausting to stacks 2P, 2P1, 4P, 5P, 6P, 6P1, 9P, 10P, 10P1, respectively; and
  - (2) Six (6) Electric Induction Ovens, identified as VACUUM-CAST-02, ROLLOVER-CAST-05, VACUUM-CAST-06, VACUUM-CAST-08, VACUUM-CAST-09, & VACUUM-CAST -10.
- (d) Three (3) natural gas Boilers, identified as BOILER-HUMIDITY, BOILER-EAST, & BOILER-DEGREASE, with a maximum rated heat input of 2, 4.2 and 1.4 million British Thermal Units (mmBtu) per hour, respectively, and exhausting to stacks B1, B3 and O4H, respectively; and
- (e) One (1) hot water heater, with a maximum rated heat input of 0.65 mmBtu per hour, respectively, and exhausting to stack HW01.
- (f) Two (2) standby diesel generators identified as GEN-AUXPWR-01 & GEN-AUXPWR-02 with a maximum capacity of 201.2 horsepower and 355 horsepower, respectively.
- (g) One (1) monoshell latex surface coating booth, identified as monoshell, with a maximum capacity of 15 wax forms per hour, using dry filters as particulate control and exhausting at one (1) stack, identified as MS1.

## **SECTION B GENERAL CONSTRUCTION CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

### **B.1 Permit No Defense [IC 13]**

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This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2 Definitions**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

### **B.3 Effective Date of the Permit [IC13-15-5-3]**

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Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

### **B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.5 Modification to Permit [326 IAC 2]**

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Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.6 Minor Source Operating Permit [326 IAC 2-6.1]**

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This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
  - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
  - (2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.



- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).
- (e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of all criteria pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.
- (c) Any change or modification which may increase potential to emit to 10 tons per year of any single hazardous air pollutant, twenty-five tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

C.3 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.4 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

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- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
  - (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

#### C.5 Inspection and Entry [326 IAC 2-7-6(2)]

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

#### C.6 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

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Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

**C.7 Permit Revocation [326 IAC 2-1-9]**

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Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

**C.8 Opacity [326 IAC 5-1]**

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

**C.9 Fugitive Dust Emissions [326 IAC 6-4]**

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The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**Testing Requirements**

**C.10 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]**

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

## **Compliance Monitoring Requirements**

### **C.11 Compliance Monitoring [326 IAC 2-1.1-11]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

### **C.12 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

### **C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]**

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- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance

related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

**C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]**

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a flow rate the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or

other parameters.

## **Record Keeping and Reporting Requirements**

### **C.15 Malfunctions Report [326 IAC 1-6-2]**

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Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

### **C.16 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]**

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- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for

failure to perform the requirements stated in (a) above.

**C.17 General Record Keeping Requirements [326 IAC 2-6.1-2]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

**C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]**

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- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance



Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) A malfunction as described in 326 IAC 1-6-2; or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.19 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit

conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

## SECTION D.1

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description

- (a) One (1) Ceramic Mold Operation, with a maximum capacity of 0.66 tons of metal and ceramic molds per hour and consisting of the following:
  - (1) One dewax furnace, with a maximum rated heat capacity of 1.9 mmBtu per hour, identified as DEWAX-BIG-BERTHA, utilizing a natural gas fired afterburner as control;
  - (2) Sanding towers, identified as STUCCO-TWR-7 thru STUCCO-TWR-22 & STUCCO-TWR-24 thru STUCCO-TWR-30, with a maximum capacity of 0.66 tons per hour of sand, utilizing a baghouse/settling chamber as particulate control, and exhausting to stacks ZD1, ZD2, and ZD3.
- (b) Finished casting line, with a maximum capacity of 3.0 tons per hour of unfinished castings and ceramic shells and consisting of:
  - (1) Arc welding gate removal, identified as PLASMA-CUTTER;
  - (2) Fifty-two (52) grinding booths, identified as DUST-COLL-FARR-001 thru DUST-COLL-FARR-004 & DUST-COLL-FARR-006 thru DUST-COLL-FARR-053, with a maximum capacity of 3.0 tons per hour of metal, each using a single cartridge-filter system as control, and exhausting to the interior of the building;
  - (3) One (1) Shotblast cabinet, identified as BLAST-05, with a maximum capacity of 3.0 tons per hour of metal, using a baghouse/settling chamber as control, and exhausting to stacks ZD1, ZD2, and ZD3;
  - (4) One (1) Power wash shell removal heater, identified as Z-WASH-003, with a maximum capacity of 1.35 mmBtu per hour;
  - (5) One (1) Chemical Shell removal heater, identified as LOW-TEMP, with a maximum capacity of 2.70 mmBtu per hour;
  - (6) Pneumatic Shell Removal, identified as KNOCKOUT-01 and KNOCKOUT-02, each with a maximum capacity of 0.33 tons per hour of casting shells, using a baghouse as control, and exhausting to stacks ZK1 and ZK2.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

## Emission Limitations and Standards

### D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the:

- (a) one (1) Shotblast cabinet, (ID BLAST-05) shall not exceed 8.56 pounds per hour when operating at a process weight rate of 6000 pounds per hour.
- (b) fifty-two (52) grinding booths, (ID DUST-COLL-FARR-001 thru DUST-COLL-FARR-004 & DUST-COLL-FARR-006 thru DUST-COLL-FARR-053) shall not exceed 8.56 pounds per hour when operating at a process weight rate of 6000 pounds per hour.
- (c) pneumatic Shell Removal, (ID KNOCKOUT-01 and KNOCKOUT-02) shall not exceed 1.95 pounds per hour when operating at a process weight rate of 660 pounds per hour.

The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and

P = process weight rate in tons per hour

## Compliance Determination Requirements

### D.1.2 Testing Requirements [326 IAC 3-6] [326 IAC 2-1.1-11]

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During the period between 30 and 36 months after issuance of MSOP091-11567-00047, the Permittee shall perform PM and PM-10 testing on the Shotblast cabinet, identified as BLAST-05, and the Pneumatic Shell Removal, identified as KNOCKOUT-01 and KNOCKOUT-02, utilizing Methods 5 or 17 (40 CFR 60, Appendix A) to verify emission factors for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance.

### D.1.3 Particulate Matter (PM)

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The baghouses for PM control shall be in operation at all times when the one (1) Shotblast cabinet, (ID BLAST-05) and pneumatic Shell Removal, (ID KNOCKOUT-01 and KNOCKOUT-02) units are in operation.

## Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]

### D.1.4 Visible Emissions Notations

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- (a) Weekly visible emission notations of the one (1) Shotblast cabinet, (ID BLAST-05 and pneumatic Shell Removal, (ID KNOCKOUT-01 and KNOCKOUT-02) units stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

### D.1.5 Parametric Monitoring

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The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the one (1) Shotblast cabinet, (ID BLAST-05) and pneumatic Shell Removal, (ID KNOCKOUT-01 and KNOCKOUT-02) units, at least once weekly when the one (1) Shotblast cabinet, (ID BLAST-05) and pneumatic Shell Removal, (ID KNOCKOUT-01 and KNOCKOUT-02) units is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 and 7.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### **D.1.6 Baghouse Inspections**

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An inspection shall be performed semi-annually of all bags used in conjunction with the one (1) Shotblast cabinet, (ID BLAST-05) and pneumatic Shell Removal, (ID KNOCKOUT-01 and KNOCKOUT-02) units when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and semi-annually thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

#### **D.1.7 Broken or Failed Bag Detection**

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In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

#### **D.1.8 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of weekly visible emission notations of the one (1) Shotblast cabinet, (ID BLAST-05 and pneumatic Shell Removal, (ID KNOCKOUT-01 and KNOCKOUT-02) units stack exhaust.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain the following:
  - (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all response steps implemented, per event .
  - (3) Operation and preventive maintenance logs, including work purchases orders, shall

be maintained.

- (4) Quality Assurance/Quality Control (QA/QC) procedures.
  - (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.
  - (7) Equipment "troubleshooting" contingency plan.
  - (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description

- (a) One Metal Melting and Auxiliary Operations, with a maximum capacity of 3.0 tons per hour of metal and consisting of:
  - (1) Nine (9) Shell Preheater Ovens, identified as VACUUM-CAST-02, ROLLOVER-CAST-05, VACUUM-CAST-06, VACUUM-CAST-08, VACUUM-CAST-09, & VACUUM-CAST-10, with a maximum rated heat input of 6.8, 0.75, 6.8, 6.8, 6.8, 0.75, 6.8, 6.8 and 0.75 million British Thermal Units (mmBtu) per hour, respectively, and exhausting to stacks 2P, 2P1, 4P, 5P, 6P, 6P1, 9P, 10P, 10P1, respectively; and
  - (2) Six (6) Electric Induction Ovens, identified as VACUUM-CAST-02, ROLLOVER-CAST-05, VACUUM-CAST-06, VACUUM-CAST-08, VACUUM-CAST-09, & VACUUM-CAST - 10.
- (b) Three (3) natural gas Boilers, identified as BOILER-HUMIDITY, BOILER-EAST, & BOILER-DEGREASE, with a maximum rated heat input of 2, 4.2 and 1.4 million British Thermal Units (mmBtu) per hour, respectively, and exhausting to stacks B1, B3 and O4H, respectively; and
- (c) One (1) hot water heater, with a maximum rated heat input of 0.65 mmBtu per hour, respectively, and exhausting to stack HW01.
- (d) Two (2) standby diesel generators identified as GEN-AUXPWR-01 & GEN-AUXPWR-02 with a maximum capacity of 201.2 horsepower and 355 horsepower, respectively.
- (e) One (1) monoshell latex surface coating booth, identified as monoshell, with a maximum capacity of 15 wax forms per hour, using dry filters as particulate control and exhausting at one (1) stack, identified as MS1.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

## Emission Limitations and Standards

### D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1(c)), particulate emissions from all facilities used for indirect heating purposes (Three (3) Boilers, identified as BOILER-HUMIDITY, BOILER-EAST, & BOILER-DEGREASE) which were constructed after September 21, 1983, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input.

### D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the one Melted Metal Operation, shall not exceed 8.56 pounds per hour when operating at a process weight rate of 6000 pounds per hour.

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

### D.2.3 Natural Gas Fuel

The three (3) natural gas Boilers, identified as BOILER-HUMIDITY, BOILER-EAST, & BOILER-DEGREASE, shall use only natural gas fuel.

## **Compliance Determination Requirements**

### **D.2.4 Testing Requirements [326 IAC 2-1.1-11]**

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The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### **Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

There are no Compliance Monitoring Requirements applicable to these emission units.

### **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

There are no Record Keeping and Reporting Requirements applicable to these emission units.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	<b>Howmet Corporation, LaPorte Casting</b>
<b>Address:</b>	<b>1110 E. Lincolnway, LaPorte, IN 46350</b>
<b>City:</b>	<b>LaPorte</b>
<b>Phone #:</b>	<b>219-326-7400</b>
<b>MSOP #:</b>	<b>091-11567-00047</b>

I hereby certify that **Howmet Corporation, LaPorte Casting** is ☒ still in operation.  
☐ no longer in operation.

I hereby certify that **Howmet Corporation, LaPorte Casting** is  
☒ in compliance with the requirements of MSOP **091-11567-00047**.  
☐ not in compliance with the requirements of MSOP **091-11567-00047**.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6  
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_, 100TONS/YEAR CARBON MONOXIDE ?\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERMIT LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ?    Y        N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ?    Y        N

COMPANY: Howmet Corporation, LaPorte Casting    PHONE NO. (219) 326-7400  
LOCATION: (CITY AND COUNTY) LaPorte, LaPorte County  
PERMIT NO. 091-11567-00047    AFS PLANT ID: 091-00047    AFS POINT ID: \_\_\_\_\_    INSP: Rick Massoels  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/\_\_\_\_20    AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_

(SIGNATURE IF FAXED)

Howmet Corporation, LaPorte Casting  
LaPorte, Indiana  
Permit Reviewer: PR/EVP

Page 26 of 27  
MSOP091-11567-00047

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

PAGE 1 OF 2

**Please note - This form should only be used to report malfunctions  
applicable to Rule 326 IAC 1-6 and to qualify for  
the exemption under 326 IAC 1-6-4.**

### **326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

### **326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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**Indiana Department of Environmental Management  
Office of Air Quality**

**Technical Support Document (TSD) for a Minor Permit Revision to a Minor  
Source Operating Permit**

**Source Background and Description**

<b>Source Name:</b>	<b>Howmet Corporation, LaPorte Casting</b>
<b>Source Location:</b>	<b>1110 E. Lincolnway, LaPorte, IN 46350</b>
<b>County:</b>	<b>LaPorte</b>
<b>SIC Code:</b>	<b>3324</b>
<b>Operation Permit No.:</b>	<b>MSOP091-11567-00047</b>
<b>Operation Permit Issuance Date:</b>	<b>July 20, 2000</b>
<b>Permit Revision No.:</b>	<b>091-13562-00047</b>
<b>Permit Reviewer:</b>	<b>Phillip Ritz/EVP</b>

The Office of Air Quality (OAQ) has reviewed a revision application from Howmet Corporation, LaPorte Casting relating to the correction in parametric monitoring recording requirements. Testing Requirements for PM and PM10 have also been added to the permit.

**History**

On December 6, 2000, Howmet Corporation, LaPorte Casting submitted an application to the OAQ requesting a correction in parametric monitoring recording requirements. Testing Requirements for PM and PM10 have also been added to the permit. Howmet Corporation, LaPorte Casting was issued a Minor Source Operating Permit on July 20, 2000.

A second letter notifying the Office of Air Management of the addition of a monoshell surface coating booth was received on January 11, 2001. There will be no increase in maximum capacity or in potential to emit for the rest of the source. This modification consists of Minor administrative changes in descriptive information concerning the source or emissions unit or units. Detailed calculations are included in the attached page. Pursuant to the provisions of 326 IAC 2-6.1-6(d)(2) the following unit will be incorporated into the unit descriptions in Section A.1 and D.2 of Minor Source Operation Permit (MSOP091-11567-00047) issued on July 20, 2000:

- (a) One (1) monoshell latex surface coating booth, identified as monoshell, with a maximum capacity of 15 wax forms per hour, using dry filters as particulate control and exhausting at one (1) stack, identified as MS1.

A third letter notifying the Office of Air Management of a change in ownership and the addition of persons as authorized individuals was received on January 26, 2001. The new owner is Alcoa, located at 201 Isabella Street, Pittsburgh, PA 15212-5858. The phone number of the owner is 412-553-4545. The name and location of the source will stay the same. Jody Warner, environmental

responsibilities, and Connie Lawe, hazardous materials technician, have been added as authorized individuals.

A fourth letter notifying the Office of Air Management of an error in the MSOP was received on February 10, 2001. Section D.1.5 references Section C "Pressure Gauge Specifications". However, the MSOP does not include a Section C "Pressure Gauge Specifications"

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
MS1	Monoshell Spray Booth	21	1.5	3,125	ambient

### Recommendation

The staff recommends to the Commissioner that the Minor Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 6, 2000. Additional information was received on January 11, 2001.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 of 1)

### Potential To Emit for the Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	0.12
PM-10	0.12
SO <sub>2</sub>	0.00
VOC	0.00
CO	0.00
NO <sub>x</sub>	0.00

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

### Potential To Emit for the Entire Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	3,621.24
PM-10	54.56
SO <sub>2</sub>	0.15
VOC	1.40
CO	21.34
NO <sub>x</sub>	25.40

HAP's	Potential To Emit (tons/year)
Lead	less than 10
TOTAL	less than 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM, PM10 and NOx are equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1-3(b).

### Justification for Modification

The MSOP is being modified through a Minor Permit Revision. The source is not adding any new control devices, however, the changes involve significant changes in the methods used to demonstrate or monitor compliance. Testing requirements are being added to verify the control efficiency and the alternative emission factors used in calculating the potential emissions from the Shotblast cabinet, identified as BLAST-05, and the Pneumatic Shell Removal, identified as KNOCKOUT-01 and KNOCKOUT-02. The testing requirements are necessary to demonstrate compliance with the requirements of 326 IAC 2-6.1, and ensure that TV (326 IAC 2-7) and FESOP (326 IAC 2-8) applicability levels have not been exceeded. This modification is being performed pursuant to 326 IAC 2-6.1-6(g)(3), as it is a modification involving a pollution control project or pollution prevention project as defined in 326 IAC 2-1.1-1 that does not increase the potential to emit of any regulated pollutant greater than the thresholds under 326 IAC 2-6.1-6(g)(4), but requires a significant change in the method or methods to demonstrate or monitor compliance.

### County Attainment Status

The source is located in LaPorte County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. LaPorte County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

There are no new Federal Rules applicable due to this Minor Permit Revision. All Federal Rules cited in Minor Source Operating Permit MSOP091-11567-00047, issued on July 20, 2000, continue to apply to this source.

### State Rule Applicability - Entire Source

There are no new State Rules applicable on a source-wide basis due to this Minor Permit Revision. All source-wide State Rules cited in Minor Source Operating Permit MSOP091-11567-00047, issued on July 20, 2000, continue to apply to this source.

### State Rule Applicability - Individual Facilities

There are no new State Rules applicable on a source-wide basis due to this Minor Permit Revision. All source-wide State Rules cited in Minor Source Operating Permit MSOP091-11567-00047, issued on July 20, 2000, continue to apply to this source.

### Changes Proposed

The following changes have been made to the Minor Source Operating Permit (091-11567-00047);

- (1) Jody Warner and Connie Lawe have been added as Authorized Individuals:

Authorized Individual: Troy T. Wilkinson, **Jody Warner and Connie Lawe**

- (2) The following unit will be incorporated into the unit descriptions in Section A.1 and D.2 of Minor Source Operation Permit (MSOP091-11567-00047) issued on July 20, 2000, and the remaining C conditions have been renumbered:

- (g) **One (1) monoshell latex surface coating booth, identified as monoshell, with a**



**maximum capacity of 15 wax forms per hour, using dry filters as particulate control and exhausting at one (1) stack, identified as MS1.**

- (3) C.14 (Pressure Gauge and Other Instrument Specifications) has been added to the permit. The remaining C conditions have been renumbered.

**C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]**

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- (a) **Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (  $\pm 2\%$  ) of full scale reading.**
- (b) **Whenever a condition in this permit requires the measurement of a flow rate the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (  $\pm 2\%$  ) of full scale reading.**
- (c) **The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.**
- (4) The frequency of compliance monitoring for MSOP091-11567-00047 was changed in the TSD addendum to that permit. However, the frequency of the recordkeeping requirements was overlooked and was not changed from daily recordkeeping to weekly recordkeeping. The source has requested that the recordkeeping frequency be changed from daily to weekly. The original addendum changed the compliance monitoring from daily to weekly, but the corresponding record keeping requirement had been left unchanged (requiring daily records). Condition D.1.8 (b)(1), Record Keeping Requirements of the permit has been modified as follows:
- ~~Daily~~**Weekly** records of the following operational parameters during normal operation when venting to the atmosphere:
- (5) Testing requirements are being added to verify the control efficiency and the alternative emission factors used in calculating the potential emissions from the Shotblast cabinet, identified as BLAST-05, and the Pneumatic Shell Removal, identified as KNOCKOUT-01 and KNOCKOUT-02. The testing requirements are necessary to demonstrate compliance with the requirements of 326 IAC 2-6.1, and ensure that TV (326 IAC 2-7) and FESOP (326 IAC 2-8) applicability levels have not been exceeded. Condition D.1.2, Testing Requirements of the permit has been modified as follows:

**D.1.2 Testing Requirements [326 IAC 3-6] [326 IAC 2-1.1-11]**

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~~The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. During the period between 30 and 36 months after issuance of MSOP091-11567-00047, the~~

**Permittee shall perform PM and PM-10 testing on the Shotblast cabinet, identified as BLAST-05, and the Pneumatic Shell Removal, identified as KNOCKOUT-01 and KNOCKOUT-02, utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance.**

- (6) The OAQ has revised the permit to replace the old name of Office of Air Management (OAM) with the new name of the Office of Air Quality (OAQ).

### **Conclusion**

The operation of the correction in parametric monitoring recording requirements and testing requirements shall be subject to the conditions of the attached proposed Minor Permit Revision 091-13562 -00047.

**Appendix A: Emissions Calculations**  
**VOC and Particulate**  
**From Surface Coating Operations**

Page 1 of 1 TSD App A

**Company Name:** Howmet Corporation, LaPorte Casting  
**Address City IN Zip:** 1110 E. Lincoln Highway Laporte, IN 46350  
**Minor Permit Revision:** 091-13562-00047  
**Reviewer:** PR/EVP  
**Date:** 12/06/2000

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
<b>Monoshell Spraybooth</b>																
Reichhold Synthemul 97982-01	8.5	67.00%	66.4%	0.6%	68.1%	33.00%	0.00063	15.000	0.16	0.05	0.00	0.01	0.00	0.12	0.16	0%

**State Potential Emissions**

**Add worst case coating to all solvents**

**0.00**

**0.01**

**0.00**

**0.12**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)